

SUBMITTER'S REBUTTAL EVIDENCE FOR STAGE 2 HEARINGS QUEENSTOWN LAKES DISTRICT COUNCIL PROPOSED DISTRICT PLAN – VISITOR ACCOMMODATION

(1) Robert Stephen Heyes – Visitor Accommodation Economics

This Report is riddled with words & statements such as assumption, estimation, interpret, unable to quantify etc.

What it clearly does not contain is any input from someone involved in short-term letting.

In particular an important fact (contrary to Mr Heyes' report) is that short-term letting does not generate more income than long-term residential letting. This is due to the expenses being much higher. Electric power, telephone/internet, cleaning, laundry, consumables, appliances, furniture, bedding, crockery cutlery cooking utensils etc all being supplied & paid for by the owner in the case of short-term letting.

I believe the report by Mr Heyes is so full of guesses and assumptions and so bereft of facts that it should be completely ignored.

(2) S42A Report – Amy Bowbyes

In this report it appears that some matters are dismissed as irrelevant due to them coming under other legislation or considered elsewhere.

I believe that this is a specious argument particularly where it relates to charges such as rates.

The proposed Visitor Accommodation Rules are draconian and unjustified (as are the existing Rules)

One way to demonstrate this is the charges – resource consent fees, rates increases which will result from these Rules regardless of what legislation they are incurred under. Applying charges that are designed for large multi-unit or multi-room complexes that are expected to be used for visitor accommodation for 50 years to single dwellings that may be used for that purpose for only part of that time period results in charges that are grossly excessive.

Brian REEVE S2443
6 August 2018